

275-B Phillips Road
Shelburne Falls, MA 01370
March 28, 1999

Dockets Management Branch
The Food and Drug Administration
Department of Health and Human Services, Rm. 1-23
12420 Parklawn Dr.
Rockville, MD 20857

Re: 99P-1340/CP 1 -- Petition to Have "Eternity eau de parfum" Misbranded

To Whom It May Concern:

I am writing in strong support of the Environmental Health Network (EHN)'s petition to have Calvin Klein's "Eternity" declared misbranded. The FDA must give this petition the scrutiny required by your regulations: 21CFR Sec. 740.1, 21CFR Sec. 740.2, and 21CFR Sec. 740.10. Regulation 21CFR Sec. 740.10.

Because many ingredients in "Eternity" are known toxins, and many others have not been tested for safety, "Eternity" is not following the guidelines the FDA has set for safety in cosmetic products and should therefore, in accordance with your regulations, be labeled with the following conspicuous statement on the principal display panel: "Warning: The safety of this product has not been determined."

It is not right, and is indeed dangerous, for the public to buy such products assuming the contents are harmless, when this is not the case. The "trade secret" laws of the perfume industry should not supersede the rights of consumers to make informed decisions. Calvin Klein needs to be held accountable for what it puts into its products.

Like tobacco smoke, the harmful chemicals currently used in these products can cause serious symptoms for many people, including those with asthma, allergies, multiple chemical sensitivity (MCS), epilepsy, and other immune or central nervous system illnesses. Children and fetuses are particularly vulnerable to toxic chemicals used by their parents, care givers and teachers.

My life has been drastically altered by my severe reactions to fragrance products, including "Eternity." Even a brief exposure to these toxic chemicals causes me asthma, headache, nausea, dizziness, sore throat, rash, impaired cognition (my ability to think, concentrate, and make appropriate decisions becomes impaired, sometimes resulting in a worse exposure because I am not able to take the steps necessary to leave). These symptoms can persist for hours or days, and are often followed by a set of delayed reactions including fever, exhaustion, and muscle pain and weakness. Because of my severe reactions to fragrance products in common use, I cannot do my own grocery shopping or errands; I can no longer work or go to school; and I can't even go to movie theaters or restaurants.

While my case is severe, recent prevalence studies show that about 30% of the population has some chemical sensitivities, perfume being an extremely common offender. And this number is rising, partly because of the increasing flood of new and more toxic products, like "Eternity," into the consumer market. Please act on behalf of the millions of people who have suffered physical illness and injury resulting from fragrance exposure at work, at school and in social settings. These toxic chemicals act as powerful barriers to people disabled by asthma and chemical sensitivities; I've been homebound since I got sick in 1995 at the age of 25. We cannot afford to continue to allow toxic chemicals to be put in fragrances without any attention or regulation.

Sincerely,


Sharon Wachslar

99P-1340

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